## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

V.

Civ. Action No. 24-03993-HB

BLACKBAUD, INC., et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

v.

Civ. Action No. 24-03998-HB

WHITEPAGES, INC., et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

v.

Civ. Action No. 24-04000-HB

HIYA, INC., et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

v.

Civ. Action No. 24-04017-HB

ACXIOM, LLC, et al.,

Plaintiffs,

v.

Civ. Action No. 24-04073-HB

COMMERCIAL REAL ESTATE EXCHANGE, INC., et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

v.

Civ. Action No. 24-04077-HB

CARCO GROUP INC., et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

v.

Civ. Action No. 24-04095-HB

TWILIO, INC., et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

v.

Civ. Action No. 24-04104-HB

6SENSE INSIGHTS, INC., et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

v.

Civ. Action No. 24-04105-HB

LIGHTBOX PARENT, L.P., et al.,

v.

v.

v.

v.

Plaintiffs,

SEARCH QUARRY, LLC, et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

ENFORMION, et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

COSTAR GROUP, INC., et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

V.

ORACLE INTERNATIONAL CORPORATION, et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

RED VIOLET, INC., et al.,

Defendants.

Civ. Action No. 24-04106-HB

Civ. Action No. 24-04110-HB

Civ. Action No. 24-04111-HB

Civ. Action No. 24-04112-HB

Civ. Action No. 24-04113-HB

Plaintiffs,

 $\mathbf{v}.$ 

Civ. Action No. 24-04114-HB

RE/MAX, LLC, et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

v.

Civ. Action No. 24-04168-HB

EPSILON DATA MANAGEMENT, LLC, et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

v.

Civ. Action No. 24-04171-HB

PEOPLE DATA LABS, INC., et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

v.

Civ. Action No. 24-04175-HB

CLARITAS, et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

v.

Civ. Action No. 24-04181-HB

DATA AXLE, INC., et al.,

Plaintiffs,

REMINE, INC., et al.,

v.

v.

v.

v.

Civ. Action No. 24-04182-HB

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

V.

LUSHA SYSTEMS, INC., et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

TELTECH SYSTEMS, INC., et al.,

ELILETI SI SI ENIS, II (C., et al.

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

PEOPLECONNECT, INC., et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

1 Iuiiitiii

CORELOGIC, INC., et al.,

Defendants.

Civ. Action No. 24-04184-HB

Civ. Action No. 24-04217-HB

Civ. Action No. 24-04227-HB

Civ. Action No. 24-04230-HB

Plaintiffs,

v.

Civ. Action No. 24-04233-HB

BLACK KNIGHT TECHNOLOGIES, LLC, et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

v.

Civ. Action No. 24-04269-HB

THOMSON REUTERS CORPORATION, et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

v.

Civ. Action No. 24-04271-HB

CHOREOGRAPH LLC, et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

v.

Civ. Action No. 24-04288-HB

TRANSUNION, LLC, et al.,

Plaintiffs,

v.

Civ. Action No. 24-04298-HB

EQUIFAX, INC., et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

V.

Civ. Action No. 24-04299-HB

SPOKEO, INC., et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

V.

Civ. Action No. 24-04354-HB

TELNYX LLC, et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

v.

Civ. Action No. 24-04392-HB

MYHERITAGE, LTD, et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

v.

Civ. Action No. 24-04442-HB

WILAND, INC., et al.,

Plaintiffs,

v.

ET

Civ. Action No. 24-04442-HB

VALASSIS DIGITAL CORP., ET AL., et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

v.

Civ. Action No. 24-04447-HB

ATDATA, LLC, et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

v.

Civ. Action No. 24-04571-HB

PRECISELY HOLDINGS, LLC, ET AL., et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

v.

Civ. Action No. 24-04696-HB

OUTSIDE INTERACTIVE, INC., et al.,

Plaintiffs,

v.

Civ. Action No. 24-04850-HB

THE LIFETIME VALUE CO. LLC, ET AL., et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

v.

Civ. Action No. 24-05334-HB

FIRST AMERICAN FINANCIAL CORPORATION ET AL, et al.,

Defendants.

ATLAS DATA PRIVACY CORPORATION, et al.,

Plaintiffs,

v.

Civ. Action No. 24-06160-HB

LEXISNEXIS RISK DATA MANAGEMENT, LLC et al.,

Defendants.

## ORDER FOR SUBJECT MATTER JURISDICTION DISCOVERY

AND NOW, this 3rd day of June, 2024, it is hereby ORDERED that:

- 1. Plaintiffs, on or before June 10, 2024, shall produce the following non-privileged documents to the Defendants that are subject to Plaintiffs' motions to remand:
  - a. All versions of the Atlas Daniel's Law Service Terms for the period starting before the first at-issue non-disclosure to the date of the last filed Complaint (the "Relevant Period") that were provided to the assignors, which include the provisions for all non-disclosure requests at issue in these actions and the assignment provision for all assignments at issue in the pending motions to remand.
  - b. Agreements referenced in the above Atlas Daniel's Law Service Terms that apply to the assignors, including:
    - i. All versions of the Atlas Privacy Policy for the Relevant Period that were provided to assignors; and
    - ii. All versions of the Atlas Service Terms for the Relevant Period that were provided to the assignors.
  - c. All versions of templates for the Assignment Confirmation for the Relevant Period that were provided to the assignors, including all assignments to Atlas at issue in the pending consolidated motion to remand.
  - d. Contracts between Atlas and law enforcement unions/ associations based in New Jersey.
  - e. A list unique to each Remand Defendant of all Covered Persons who received a written Assignment Confirmation regarding assignment of their claims against that Remand Defendant, including (a) the name of the Covered Person, (b) the type of occupation or relationship covered by Daniel's Law, (c) the date of the Assignment Confirmation, and (d) the personal information included in the non-disclosure requests that those Covered Persons transmitted to that specific Remand Defendant. For Remand Defendants with multiple websites, a list will be provided for each site.

- f. Documents in Atlas's possession concerning the citizenship of any of the Remand Defendants as related to subject matter jurisdiction (excluding basic contact information).
- g. Documents in Atlas's possession concerning the subject matter jurisdiction of the court.
- 2. Plaintiffs, on or before June 10, 2024, shall produce a witness under Rule 30(b)(6) of the Federal Rules of Civil Procedure prepared to discuss the following topics:
  - a. Documents produced in response to the categories listed above in so far as the questions are relevant to subject matter jurisdiction.
  - b. Atlas's business interests in enforcing Daniel's Law in so far as it relates to the issue of any allegations of "shams" or "collusion" to avoid federal court jurisdiction.
  - c. Atlas's decision to incorporate in the State of Delaware.
  - d. The process for the assignments to Atlas by the Covered Persons.
  - e. The assignments provided by individuals included in the Covered Person's Lists provided by Atlas to the Remand Defendants.
  - f. An explanation of the services that Atlas provides to its users, including the Covered Persons.
  - g. Whether there was any consideration by Atlas or any discussion by Atlas with any Covered Persons regarding whether the assignments would in any way impact the jurisdiction of the courts in any of these actions.

BY THE COURT:

Case 1:24-cv-04354-HB Document 16-1 Filed 06/03/24 Page 12 of 12 PageID: 627

\_\_\_\_\_

Hon. Harvey Bartle, III United States District Judge